

From the GAO Report: ***Coastal Zone Management: Opportunities Exist for NOAA to Enhance its Use of Performance Information*** (July 2014)

p. 11: Congress has generally provided direction on the total amount of funds to be awarded through the coastal nonpoint program to assist with states' coastal nonpoint pollution control programs, which are programs to ensure states have necessary tools and enforceable authorities to prevent and control polluted runoff in coastal areas. According to NOAA officials, funding has not been provided for this program since fiscal year 2009, when nearly \$3.4 million was awarded to states.

p. 22: **Coastal water quality.** States allocated CZMP funds for water quality permitting and enforcement activities... Activities include those that support states in implementing their coastal nonpoint source pollution control programs. According to NOAA's CZMP performance measurement system data, from 2008 through 2013, states reported that they worked with more than 680 communities to develop nonpoint source pollution management policies and plans, or complete related projects, and removed 27 million pounds of marine debris through coastal cleanup activities.

p. 26: On the other hand, we found limitations in the CZMP performance measurement system that did not align with the key attributes. For instance, in 2011, NOAA eliminated its coastal water quality focus area—corresponding to one of the six focus areas based on goals of the CZMP outlined in the act. In eliminating this focus area, NOAA removed five related performance measures; states continue to report on one measure related to coastal water quality, but do so under another focus area on coastal community development. Balance, or having a set of measures that cover a program's various goals, is a key attribute of successful performance measures. We found that having measures that correspond to various program goals provided agencies with a complete picture of performance. NOAA officials indicated that they eliminated the coastal water quality focus area based on a 2011 performance measurement system workgroup's recommendation to streamline the measurement system. They further explained that they took this action because state programs were no longer receiving coastal nonpoint program funding, which often funded activities in support of coastal water quality, and that activities under this focus area were often tied to the coastal community development focus area. In speaking with some state program officials, however, we found that improving coastal water quality remains a priority for their programs even without coastal nonpoint program funding.

p. 23: Similarly, representatives from the Coastal States Organization's coastal water quality workgroup indicated that many state programs have made progress in developing and implementing coastal nonpoint pollution control programs, but that these results are not quantified by NOAA.

p. 39: We provided a draft of this report to the Department of Commerce for review and comment. In written comments provided by NOAA through Commerce (reproduced in appendix IV), NOAA generally agreed with our findings and concurred with our recommendations. NOAA also provided technical comments that we incorporated, as appropriate. In its comment letter, NOAA stated that while it found GAO's evaluation of the CZMP performance measurement system accurate, the agency did not agree with GAO's assessment that eliminating a stand-alone category for coastal water quality could negatively affect the system's ability to reflect the goals of the CZMA in a balanced way. NOAA stated that removal of the coastal water quality focus area did not impair its ability to track progress in meeting the water quality goal of the CZMA, explaining that it retained one measure composed of two data

elements related to coastal water quality, but housed under a different focus area. We agree that the two-part measure NOAA maintained related to coastal water quality may provide important information on performance in this area. However, we continue to believe that the information it is collecting related to coastal water quality may not be balanced in comparison to the information it is collecting for the other five focus areas...